

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re TOMMY HILFINGER SECURITIES	:	Lead Case No. 1:04-CV-07678-SAS
LITIGATION	:	
	:	<u>ELECTRONICALLY FILED</u>
	:	
This Document Relates To:	:	<u>CLASS ACTION</u>
	:	
ALL ACTIONS.	:	
	:	
	X	

LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR (1) FINAL APPROVAL
OF SETTLEMENT AND PLAN OF ALLOCATION OF SETTLEMENT PROCEEDS; AND
(2) AWARD OF ATTORNEY FEES AND EXPENSES

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that on October 15, 2008, at 4:30 p.m., at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, or as soon thereafter as counsel may be heard before the Honorable Shira A. Scheindlin, United States District Judge, Lead Plaintiffs will and hereby move for orders and/or judgments (1) finally approving the settlement of this class action and dismissing the litigation with prejudice and approving the Plan of Allocation of settlement proceeds; and (2) awarding Lead Plaintiffs' Counsel attorney fees of 25% of the Settlement Fund plus expenses. Lead Plaintiffs' motion is based upon the Memorandum of Law in Support of Motion for Final Approval of Settlement and Plan of Allocation of Settlement Proceeds, the Memorandum of Law in Support of Motion for an Award of Attorney Fees and Expenses, the Declarations of counsel submitted in support thereof, the Stipulation of Settlement, all other pleadings and matters of record, and such additional evidence or argument as may be presented in Lead Plaintiffs' application or at the hearing on Lead Plaintiffs' motion.

DATED: September 24, 2008

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 24, 2008.

s/ Robert M. Rothman

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Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)

Manual Service List
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Case No. 1:04-cv-07678-SAS

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